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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SANDRA HERRERA,

Plaintiff,

vs.

FLORENCE MCCLURE WOMEN'S
CORRECTIONAL CENTER FACILITY;
STATE OF NEVADA ex rel. NEVADA
DEPARTMENT OF CORRECTIONS, a
Political Subdivision of the State of Nevada;
TIMOTHY CALUMPONG, Director of
Nursing, FMWCC, and individually; BETTY
S. OMANDAC, Nurse Practitioner, FMWCC,
and individually; ELLA CORDOVEZ, Nurse
Practitioner, FMWCC, and individually;
GABRIELA NAJERA, Warden, FMWCC,
and individually; MICHAEL MINEV,
Medical Director, NDOC and individually;
CHARLES DANIELS, Director, NDOC, and
individually; DOE INDIVIDUALS 1-100,
inclusive; ROE CORPORATIONS 1-100,
inclusive;

Defendants.

CASE NO.: 2:23-cv-01397-JAD-BNW

**STIPULATION TO EXTEND
PLAINTIFF'S RESPONSE DEADLINE
FOR DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT [ECF NO. 28]
(FIRST REQUEST)**

Plaintiff, SANDRA HERRERA, by and through attorney of record, JAMES D. URRUTIA,
ESQ. of LJU LAW FIRM, and State Defendants, by and through their attorney of record, MAYRA
GARAY, ESQ., of the OFFICE OF THE ATTORNEY GENERAL hereby submit their stipulation

1 and agreement to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary
 2 Judgment [ECF 28] and respectfully request that the Court extend the response deadline for a period
 3 of thirty (30) days, making Plaintiff's Response to Defendants Motion for Summary due on Friday
 4 April 18, 2025. The parties request is supported in good cause.

5 On February 26, 2025, Defendants submitted their Motion for Summary Judgment [ECF
 6 28], accompanied by a supplemental disclosure of documents. In addition to the documents
 7 produced in their Initial Disclosure, Defendants have identified further documents marked as
 8 "attorney's eyes only" in a discovery log. These documents will be made available to Plaintiff once
 9 a Protective Order is established. Although Plaintiff's counsel has had the opportunity since
 10 September 2024 to request a Protective Order, the parties have agreed to extend the response
 11 deadline to April 18, 2025, to facilitate the establishment of this Protective Order and the subsequent
 12 disclosure of the protected documents.

13 Dated this 12th day of March, 2025.

Dated this 12th day of March, 2025.

14 **LJU LAW FIRM**

OFFICE OF THE ATTORNEY GENERAL

15 /s/ James D. Urrutia

/s/ Mayra Garay

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 20 *Counsel for Plaintiff*

MAYRA GARAY, ESQ.
 (Bar No.)
 1 State of Nevada Way, Suite 100
 Las Vegas, NV 89119
Counsel for Defendants

21 **IT IS SO ORDERED.**

22 **DATED:** 3/25/2025

23 
 24 **UNITED STATES MAGISTRATE JUDGE**